

FILED  
CLERK OF COURT  
2025 FEB 24 AM 10:01  
DISTRICT OF COLUMBIA

UNITED STATES DISTRICT COURT  
FOR THE FIRST CIRCUIT

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL JACQUES,

Defendant.

Case No: 3:09-cr-30001

### MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

NOW COMES the Defendant, Michael Jacques, pro se, and respectfully moves this Honorable Court for an order granting early termination of supervised release pursuant to 18 U.S.C. § 3583(e)(1). In support of this motion, Defendant states as follows:

#### 1. Background

1. On December 22, 2011, this Court sentenced Defendant to 166 months of imprisonment, followed by 48 months of supervised release.

2. Defendant has successfully completed 2 years and 44 days of supervised release as of 2/14/25 and has complied with all conditions imposed by the Court.

#### 2. Legal Standard

3. Under 18 U.S.C. § 3583(e)(1), the Court may terminate supervised release early after the defendant has completed at least one year, if such termination is warranted by the defendant's conduct and in the interest of justice.

4. In making this determination, the Court considers the factors outlined in 18 U.S.C. § 3553(a), including:

- The nature and circumstances of the offense;
- The history and characteristics of the defendant;
- The need for deterrence and protection of the public;
- The need to provide the defendant with educational or vocational training, medical care, or other rehabilitation.

5. Justification for Early Termination

- Defendant has fully complied with all conditions of supervised release, including:
- Successfully completing all court-ordered programs, including drug treatment, mental health treatment, and counseling.
- Maintaining stable employment since release as the Senior Operations Manager at Imperial Landscaping.
- Receiving a letter of support from employer, attesting to Defendant's professionalism and contributions to the workplace as well as character.

6. Defendant has demonstrated a strong commitment to community service and rehabilitation, including:

- Mentoring students from Norfolk Aggie and Blue Hills High Schools in the Dedham area, providing hands-on training in landscaping, hardscaping, and agriculture.
- Participating in community events, including Flag Day and Fourth of July parades in Dedham, Canton, Westwood, and Norwood, distributing beach balls to children and organizing a community cookout open to all.
- Providing care and financial support for their 63-year-old mother.

7. Defendant has successfully reintegrated into society and poses no risk to public safety. Continued supervision does not serve any rehabilitative or deterrent purpose.

4. Conclusion

8. Based on the foregoing, Defendant respectfully requests that this Honorable Court enter an order terminating the remainder of Defendant's supervised release.

WHEREFORE, Defendant prays that this Court grant the requested relief.

Respectfully submitted,

Michael Jacques

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